

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CHARLENE CARTER,

Plaintiff,

V.

**SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION OF
AMERICA, LOCAL 556,**

Defendants.

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CIVIL CASE NO. 3:17-CV-02278-X

DECLARATION OF MICHAEL MASSONI

STATE OF Texas
COUNTY OF Dallas

I make the following declaration subject to the penalties for perjury under the laws of the United States of America:

1. My name is Mr. Michael Massoni. I am over twenty-one years of age, and I have never been convicted of a felony. I am fully competent to make this declaration.
2. I currently serve as the 1st Vice President of TWU Local 556 and I have personal knowledge of the facts stated herein, and they are all true and correct.
3. The Union currently employs four (4) full time individuals: (1) Madeleine Howard – Finance Manager, (2) Debbie Huntsman – Executive Assistant, (3) Lisa Le – Office Coordinator, and (4) Juanita Stangler – Financial Services Specialist.
4. At the time of Mrs. Carter's firing, the same above people were employed with the addition of Cliff Mase – IT Specialist, who has since retired.

5. In addition to the above full time employees, the Union has an approximately additional forty five (45) people who are either on part time or full time “pulls” from flying duties to work in the Union office. These 45 individuals include Union Officers and additional office staff.
6. Further, Affiant saith not.



Michael Massoni